

State of Alabama } Circuit Court.
Barlow County

To Hon. J. W. Richardson
Register of the Circuit Court,
Bay Minneter, Ala.

Dear Sir: I enclose the temporary report
of Jurgensen as prayed for in the within
Bill of Complaint.

Witness my hand this 31 day of May
1917.

W. E. Gaubly
Judge of the 2nd Judicial
Circuit of Alabama.

No.

THE STATE OF ALABAMA,

County.

CIRCUIT COURT, IN EQUITY.

The State of Alabama.

vs.
Complainant

J. D. Wyndham and R. E. Catrett.

Defendant

ORIGINAL BILL.

Filed 5/30 19 17

J. W. Richardson
Register.

H. D. Moore.
Solicitor.

Honorable Court complainant is entitled to receive.

Henry D. Moorner
Deputy Solicitor for Baldwin Co.

Foot Note:

The Respondents and each of them are required to answer each paragraph of the foregoing bill, but answer under oath is hereby expressly waived.

Henry D. Moorner
Deputy Solicitor, Baldwin Co. Ala.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

Before me, W. C. Beebe, a Notary Public, in and for said County and State, personally appeared Henry D. Moorner, who being by me duly sworn doth depose and say that he is the Deputy Solicitor of Baldwin County, State of Alabama, that he is informed and has probable cause for believing and does believe that the allegations contained in the foregoing bill of complaint are true.

Henry D. Moorner

Sworn and Subscribed to before me this 30th day
of May, 1917.

W. C. Beebe
Notary Public, Baldwin County, Ala.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

IN THE CIRCUIT,
IN EQUITY.

TO THE HONORABLE THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,
AND TO THE HONORABLE A. E. GAMBLE, JUDGE THEREOF:

Comes the State of Alabama by Henry D. Moorer, its Deputy Solicitor for Baldwin County, Alabama, an officer duly authorized to prosecute criminal causes in said County, who relates, gives the court to understand, and who brings this bill of complaint in the name of the State of Alabama against J. D. Windham and R. E. Catrett both residents of Baldwin County, Alabama, over the age of twenty-one years and respectfully shows unto the court as follows:

1. Respondent R. E. Catrett is the owner of the premises known as Lot 55 in the old Town of Bay Minette, Alabama according to the L. & N. Railroad survey, being a lot upon which is erected a frame dwelling house, said building being now occupied or rented by the said J. D. Windham.

2. The Respondent J. D. Windham is the agent, lessee or tenant of the owner of the building known as Lot 55 in the old town of Bay Minette, Alabama, according to the L. & N. Railroad survey.

3. Respondent J. D. Windham is the lessee of the building erected upon Lot 55 in the old town of Bay Minette, Alabama, according to the L. & N. Railroad survey, said building being owned by the said R. E. Catrett.

4. That the respondents maintain a liquor nuisance upon said premises in that they use said building on said premises for the purpose of selling, bartering, exchanging or otherwise disposing of spiritous, vinous or malt liquors in violation of the law.

5. That the respondents J. D. Windham and R. E. Catrett, maintain a liquor nuisance upon said premises in that they use said building on said premises for the purpose of keeping for sale, or

other unlawful disposition of spiritous, vinous or malt liquors in violation of the law.

6. That the respondent R. E. catrett has information that the said J. D. Windham was charged and convicted of selling spiritous, vinous or malt liquors, and that he still allows the said J. D. Windham to occupy the premises and to maintain a liquor nuisance in that he is allowed to keep for sale, or other unlawful disposition of spiritous, vinous or mault liquors in violation of law.

PRAYER FOR PROCESS.

Complainant respectfully prays for the issue of the State's writ of Subpoena by this Honorable Court to each of the respondents, commanding them to appear and true answer make to this bill of complaint.

PRAYER FOR RELEIF.

Complainant prays that your Honor forthwith issue a preliminary writ of injunction restraining the respondents, their servants, agents, employees or assistants from maintaining a liquor nuisance upon the aforesaid premises or any part thereof, from using the aforesaid premises or any part thereof for the unlawful sale, furnishing or keeping of prohibited liquors or beverages, fr from the use of the above premises for the purpose of keeping for sale or other unlawful disposition of spiritous, vinous or malt lliquors contrary to law.

Complainant further prays that upon the final hearing of this cause it may please your Honor to adjudge and decree the above described premises to be a liquor nuisance and to abate the same by the issue and enforcement of a final injunction directed to each and all of the parties made respondents, their servants, agents, employees and assistants.

Complainant further prays for all such further and other or different releif as by law and the practise of this